

EXHIBIT 2

COPY

Deposition of Robert Pascarella

Maria Guadalupe Durn De Yepez, Ind., et al vs. Filiberto Villarreal, et al

1 CAUSE NO. C-3505-14-F

2 MARIA GUADALUPE DURN DE YEPEZ,) IN THE DISTRICT COURT

3 Individually, and on behalf of)

4 PEDRO YEPEZ (Deceased) and)

5 P.Y.D. (minor), GUADALUPE)

6 YEPEZ DURAN, KARINA YEPEZ)

7 DURAN, And CLARA YEPEZ DURAN;)

8 ENRIQUE YEPEZ OLVERA and)

9 MARIA DE CONSUELO GONZALEZ)

10 ALCALA, Individually and)

11 jointly on behalf of I.Y.G.)

12 (minor); and MARTIN YEPEZ) 332ND JUDICIAL DISTRICT

13 OLVERA and NORA SILVIA)

14 MARTINEZ DE YEPEZ,)

15 Plaintiffs,)

16 VS.)

17 FILIBERTO VILLARREAL AND)

18 FORD MOTOR COMPANY,)

19 Defendants.) HIDALGO COUNTY, TEXAS

ORAL DEPOSITION OF

ROBERT PASCARELLA

AUGUST 3, 2017

19

20 THE ORAL DEPOSITION OF ROBERT PASCARELLA,

21 produced as a witness at the instance of the

22 Intervenors, and duly sworn, was taken in the

23 above-styled and numbered cause on the 3rd day of

24 August, 2017, from 9:40 a.m. to 2:26 p.m., before JULIE

25 VERASTEGUI, Certified Court Reporter, in and for the

Deposition of Robert Pascarella

Maria Guadalupe Durn De Yopez, Ind., et al vs. Filiberto Villarreal, et al

1 And I think that brings us to how we went
2 backwards previously.

3 Q. When you got into the design analysis group in
4 2002, were you doing the similar thing that you're doing
09:45:22 5 now, which is analyzing claims for Ford Motor Company?

6 A. I -- I was. Started off just technical
7 consulting in the areas of claims and litigation, and
8 then, after that, got into the more detailed
9 investigations, a lot of it spurred by the Firestone
09:45:38 10 fiasco.

11 Q. Okay. And so as you sit here today, would you
12 consider yourself the Ford representative to -- to talk
13 about claims and litigation?

14 A. I wouldn't think that was my role in this case.
09:45:52 15 I'm -- I'm here as -- as my analysis and evaluation of
16 this particular case.

17 Q. But in general, are you the -- the go-to guy
18 for Ford Motor Company for claims and litigation -- to
19 analyze claims and litigation?

09:46:06 20 A. No. We have a group of individuals in our
21 department with different areas of expertise that will
22 look at different claims, whether they be warranty or
23 things that arise from litigation.

24 Q. Okay. And as far as you're concerned, what
09:46:18 25 would be your area of expertise? If a claim or -- or a

Deposition of Robert Pascarella

Maria Guadalupe Durn De Yopez, Ind., et al vs. Filiberto Villarreal, et al

1 lawsuit comes in, what's going to come onto your desk?

2 A. Generally would be things consistent with my
3 experience in vehicle dynamics, chassis design, brakes,
4 vehicle performance from a handling and steering
09:46:36 5 perspective. Those are the things I traditionally do.

6 Q. Okay. So if a -- if a lawsuit comes in that's
7 a crashworthiness case dealing with a roof crush, that's
8 going to go to somebody else?

9 A. That's something -- If I'm asked to go take an
09:46:50 10 initial look, I -- I clearly would do so, but I don't
11 claim to have any expertise in that area.

12 Q. Okay. You might be looking at how the vehicle
13 got to where it got to when it started rolling, but
14 beyond that, the actual roof crush would not be
09:47:02 15 something that you would look at?

16 A. That is correct.

17 Q. Okay. What -- Are you married?

18 A. Yes, sir.

19 Q. How long have you been married?

09:47:10 20 A. Coming up on 27 years.

21 Q. Congratulations.

22 A. Made it.

23 Q. Kids?

24 A. Three boys.

09:47:16 25 Q. Three boys. How old are they?